

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 19-md-02913-WHO

TRIAL TESTIMONY AND EXHIBITS
FROM THE VIDEOTAPED TESTIMONY
OF JESSICA EDMONDSON TAYLOR,
INFLUENCER MARKETING MANAGER,
PLAYED AT TRIAL

This Document Relates to:

*San Francisco Unified School District v.
Juul Labs, Inc. et al.*, Case No. 3:19-cv-
08177

Plaintiff, by and through its undersigned attorneys, hereby docket the following:

1. **Exhibit 1** is a report of the videotaped testimony of Jessica Edmondson Taylor, Influencer Marketing Manager, that was played to the jury on April 26, 2023. The testimony in blue 00:11:19 and light blue 00:00:21 is Plaintiff's affirmative and counter-counter designations.
2. **Exhibit 2:** is a *Joint Stipulation Identifying Trial Exhibits Used In Videotaped Depositions of Jessica Edmondson Taylor Played at Trial* that sets forth all of the Trial Exhibits from the videotaped testimony of Jessica Edmondson Taylor admitted into evidence by the Court.

Respectfully submitted,

By: /s/ Michael M. Weinkowitz

Michael M. Weinkowitz

LEVIN SEDRAN & BERMAN, LLP

510 Walnut Street

Suite 500

Philadelphia PA 19106

Telephone 215-592-1500

MWeinkowitz@lfsblaw.com

Plaintiff Steering Committee Member

Sarah R. London

Sarah R. London

LIEFF CABRASER HEIMANN & BERNSTEIN

275 Battery Street, Fl. 29

San Francisco, CA 94111

Telephone: (415) 956-1000

slondon@lchb.com

By: /s/ Dena C. Sharp

Dena C. Sharp

GIRARD SHARP LLP

601 California St., Suite 1400

San Francisco, CA 94108

Telephone: (415) 981-4800

dsharp@girardsharp.com

By: /s/ Dean Kawamoto

Dean Kawamoto

KELLER ROHRBACK L.L.P.

1201 Third Ave., Ste. 3200

Seattle, WA 98101

Telephone: (206) 623-1900

By: /s/ Ellen Relkin

Ellen Relkin

WEITZ & LUXENBERG

700 Broadway

New York, NY 10003

Telephone: (212) 558-5500

Co-Lead Counsel for Plaintiff

EXHIBIT 1

Edmondson, Jessica SFUSD

FINAL_PLAYED 04-26-23

Designation List Report



Edmondson taylor, Jessica

2021-03-11

Edmondson taylor, Jessica

2021-03-12

PLF AFFIRMATIVE

00:11:19

DEF COUNTER

00:00:24

PLF COUNTER-COUNTER

00:00:21

TOTAL RUN TIME

00:12:04



Documents linked to video:

TAYLOR1406



EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
12:02 - 12:02	Edmondson taylor, Jessica 2021-03-11_WIT 12:02 Can I call you Ms. Edmondson?	00:00:01	EJv4.1
12:06 - 12:07	Edmondson taylor, Jessica 2021-03-11_WIT 12:06 A. Taylor is my name, Edmondson is 12:07 my maiden, so Ms. Taylor would be great.	00:00:04	EJv4.2
13:05 - 13:11	Edmondson taylor, Jessica 2021-03-11_WIT 13:05 Q. Okay. I am going to ask you 13:06 questions about your work at JUUL and other 13:07 related topics. If I ask you a question that 13:08 you don't understand, please ask me to 13:09 rephrase it. 13:10 Okay? 13:11 A. Okay.	00:00:15	EJv4.3
15:09 - 15:16	Edmondson taylor, Jessica 2021-03-11_WIT 15:09 Q. Am I correct in understanding 15:10 that you went to work for JUUL in September 15:11 of 2017? 15:12 A. Yes, September 2017. 15:13 Q. You were initially hired as the 15:14 influencer marketing manager, I believe, was 15:15 your title? 15:16 A. Yes, that's correct.	00:00:18	EJv4.4
15:21 - 16:05	Edmondson taylor, Jessica 2021-03-11_WIT 15:21 Q. You understood that when you 15:22 went to work for JUUL it was a tobacco 15:23 company? 15:24 A. I understood that it was an 15:25 e-cigarette-based company, yes. 16:01 Q. Okay. And you understood that 16:02 its products contained nicotine, an addicting 16:03 substance? 16:04 A. Yes, I understood that the 16:05 products contained nicotine.	00:00:21	EJv4.5
45:18 - 46:02	Edmondson taylor, Jessica 2021-03-11_WIT 45:18 In late 2018, Altria made an 45:19 investment in JUUL. 45:20 You were aware of that, 45:21 correct? 45:22 A. Yes.	00:00:26	EJv4.6



EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	45:23 Q. Had there been rumor or were 45:24 you aware by any means that Altria was in 45:25 negotiations with JUUL prior to the company 46:01 announcement, which I believe was in November 46:02 or December of 2018?		
46:04 - 46:18	Edmondson taylor, Jessica 2021-03-11_WIT 46:04 THE WITNESS: No, prior to the 46:05 announcement, I had no idea. 46:06 QUESTIONS BY MR. GOZA: 46:07 Q. Prior to that announcement, you 46:08 had made representations that JUUL was not 46:09 big tobacco. 46:10 Do you recall that? 46:11 A. I remember the statement "we 46:12 are not big tobacco" in an on-boarding 46:13 document when I started. 46:14 Q. And were you therefore 46:15 surprised when JUUL announced that Altria had 46:16 invested in the company? 46:17 A. Yes, I think it's fair to say I 46:18 was surprised.	00:00:37	EJv4.7
65:15 - 65:20	Edmondson taylor, Jessica 2021-03-11_WIT 65:15 I see you had a fair 65:16 amount of experience in the influencer world 65:17 or developing influence before you came to 65:18 JUUL; is that correct? 65:19 A. Yes, I was experienced in 65:20 influencer marketing before JUUL.	00:00:13	EJv4.8
66:15 - 66:21	Edmondson taylor, Jessica 2021-03-11_WIT 66:15 All right. Exhibit 1406 is 66:16 JLI00386642, and this is the JUUL influencer 66:17 recap 2017. 66:18 I assume as the influencer 66:19 marketing manager at JUUL, you had some role 66:20 in developing this, correct? 66:21 A. Yes.	00:00:27	EJv4.9
66:22 - 66:23	Edmondson taylor, Jessica 2021-03-11_WIT 66:22 Q. If we could go to the next	00:00:03	EJv4.10




TAYLOR1406.1
.1

EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 TAYLOR1406.2 .1	66:23 page,		
66:23 - 67:09	Edmondson taylor, Jessica 2021-03-11_WIT 66:23 this talks about -- where it says, 66:24 "JUUL seen in 2017," these are some of the 66:25 highlights of media places at which JUUL 67:01 appeared. 67:02 Is that -- a JUUL device 67:03 appeared, correct? 67:04 A. Yes, these are earned media 67:05 placements. 67:06 Q. Does JUUL -- and first of all, 67:07 did you create this entire document, or was 67:08 it you and Kate Morgan together? 67:09 A. It was a collaboration.	00:00:30	EJv4.11
67:17 - 68:07	Edmondson taylor, Jessica 2021-03-11_WIT  TAYLOR1406.2 .2 67:17 Q. It says, "JUUL 67:18 cultivates relationships and has developed a 67:19 cult-like following from countless 67:20 celebrities, content creators and 67:21 word-of-mouth advocacy -- advocates." Sorry. 67:22 Did I read that correctly? 67:23 A. Yes, that's what it says. 67:24 Q. And when you say "cult-like 67:25 following," what did you mean by that? 68:01 A. I don't remember writing that. 68:02 Q. But at some point you would 68:03 have seen it. And you and Kate Morgan and 68:04 Chelsea Kania, as you're collaborating on 68:05 putting this document together, do you 68:06 remember what you were talking about when you 68:07 arrived at that description?	00:00:50	EJv4.12
68:08 - 68:10	Edmondson taylor, Jessica 2021-03-11_WIT 68:08 A. I don't remember the specific 68:09 context of how the sentence basically came to 68:10 be.	00:00:07	EJv4.13
68:11 - 68:17	Edmondson taylor, Jessica 2021-03-11_WIT 68:11 Q. Let's go to the next	00:00:14	EJv4.14


EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
 TAYLOR1406.2 .3	68:12	sentence.	
	68:13	"JUUL will be expanding the	
	68:14	influencer outreach program."	
	68:15	And that was your job, true?	
	68:16	A. Yes, that's what I was hired to	
	68:17	do, expand an influencer marketing program.	
68:18 - 69:03	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:37	EJv4.15
	68:18	Q. And it said, "In 2018, we	
	68:19	expect to massively scale our presence via	
	68:20	press and social media."	
	68:21	Did I get that correct?	
	68:22	A. That's what the document says.	
	68:23	Q. What was the plan to massively	
	68:24	scale your presence via press and social	
	68:25	media?	
	69:01	A. I don't remember the context of	
	69:02	our plan beyond looking at -- and through	
	69:03	this document.	
69:06 - 69:11	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:16	EJv4.16
	69:06	it says, "We	
	69:07	expected to massively scale our presence via	
	69:08	press and social media, which currently	
	69:09	already has a massive reach of 170 million on	
	69:10	social and 600 million estimated earned media	
	69:11	reach."	
69:12 - 69:13	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:04	EJv4.17
	69:12	Let me ask you: What does the	
	69:13	term "earned media reach" mean?	
69:14 - 70:01	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:45	EJv4.18
	69:14	A. In my opinion, earned media is	
	69:15	nonpaid and essentially something that a	
	69:16	brand doesn't force. It happens organically.	
	69:17	Q. Okay. So you knew that you had	
	69:18	reached an organic growth that reached up to	
	69:19	600 million people. Or 600 million -- I	
	69:20	guess that -- let me strike that -- a massive	
	69:21	reach of 600 million estimated earned media	
	69:22	reach.	


EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	69:23 Tell me what that term means.		
	69:24 A. I don't know the specific		
	69:25 context of what earned media reach means in		
	70:01 this very specific document.		
71:20 - 71:25	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:15	EJv4.19
 TAYLOR1406.2	71:20 Q. We have here a picture		
.4	71:21 of Katy Perry; is that correct?		
	71:22 A. Yes, that's Katy Perry.		
	71:23 Q. And she's holding a JUUL in her		
	71:24 hand and smiling, right?		
	71:25 A. Yes, she's holding a JUUL.		
72:01 - 72:09	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:23	EJv4.20
	72:01 Q. And next to her is Orlando		
	72:02 Bloom?		
	72:03 A. Yes, that's Orlando Bloom.		
	72:04 Q. And Kate Perry was what you		
	72:05 would call a tier 1 influencer, true?		
	72:06 A. Katy Perry is a celebrity.		
	72:07 Q. She is a celebrity, but you		
	72:08 created a list of tier 1, tier 2 and tier 3		
	72:09 influencers, correct?		
72:16 - 72:22	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:15	EJv4.21
	72:16 A. Yes, I remember there was a		
	72:17 tier system of influencers.		
	72:18 Q. Okay. And do you remember		
	72:19 whether or not Katy Perry was listed as a		
	72:20 tier 1?		
	72:21 A. I believe Katy Perry was part		
	72:22 of the celebrities.		
72:23 - 73:07	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:28	EJv4.22
	72:23 Q. Over to the right side -- first		
	72:24 of all, do you know how many followers Katy		
	72:25 Perry has on social media?		
	73:01 A. Not off the top of my head, no.		
	73:02 Q. You know that she has an album		
	73:03 that was called Teenage Dream, correct?		
	73:04 A. Yes, I'm aware of it.		
	73:05 Q. Yeah.		

EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	73:06 You know that many of her		
	73:07 followers are under the age of 21, correct?		
73:10 - 73:11	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:03	EJv4.23
	73:10 THE WITNESS: I know that Katy		
	73:11 Perry has a wide audience.		
74:02 - 74:14	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:34	EJv4.24
 TAYLOR1406.2	74:02 How about Leonardo DiCaprio?		
.5			
	74:03 He's there, pictured, true?		
	74:04 A. Yes, that's him.		
	74:05 Q. Yeah. And you -- Leonardo		
	74:06 DiCaprio was part of your VIP portal		
	74:07 customers, true?		
	74:08 A. Yes, that's correct.		
	74:09 Q. And a VIP portal customer got		
	74:10 fairly significant discount products and		
	74:11 opportunities to get new products that came		
	74:12 out immediately, didn't they?		
	74:13 A. Yes, that was part of the		
	74:14 portal offerings.		
74:16 - 74:21	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:15	EJv4.25
	74:16 And why would you give		
	74:17 celebrities like that -- why would you give		
	74:18 them portal or VIP status and give them		
	74:19 discounts and access to products earlier than		
	74:20 people would have access? Why would you do		
	74:21 that?		
74:22 - 74:25	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:09	EJv4.26
	74:22 A. If you're asking for the		
	74:23 premise of the VIP portal, I would say to		
	74:24 build relationships with adult smokers who		
	74:25 had switched to the product.		
75:01 - 75:04	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:10	EJv4.27
 TAYLOR1406.2	75:01 Q. And is it fair to say		
.6			
	75:02 that in building those relationships, it is		
	75:03 beneficial to you as a company for		
	75:04 celebrities to be seen using your product?		
75:06 - 75:10	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:11	EJv4.28

EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	75:06 THE WITNESS: Yes, I think		EJv4.28
	75:07 earned media placements of adult		
	75:08 smokers who are on to our product now,		
	75:09 who are celebrities, does benefit the		
	75:10 company.		
79:07 - 79:22	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:48	EJv4.29
 TAYLOR1406.3 .1	79:07 There was a tier 1 of		
	79:08 celebrities, true?		
	79:09 A. There was a tier of celebrities		
	79:10 that was listed as 1, that's true.		
 TAYLOR1406.3 .2	79:11 Q. And it says in 2017 there were		
	79:12 currently 20-plus of them who are active		
	79:13 users.		
	79:14 Did I read that correctly?		
	79:15 A. Yes, that's what it says.		
	79:16 Q. And it says, "These known		
	79:17 public figures have a large reach, not only		
	79:18 from their own social media channels but also		
	79:19 from international publications that cover		
	79:20 their lives and whereabouts."		
	79:21 Correct?		
	79:22 A. Yes, that's what it says.		
80:23 - 81:06	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:28	EJv4.30
	80:23 Showing celebrities using JUUL		
	80:24 increases brand awareness and visibility for		
	80:25 the product, true?		
	81:01 A. Yes, that's true.		
 TAYLOR1406.3 .4	81:02 Q. And here it says, "Social media		
	81:03 reach of these celebrities was 163 million		
	81:04 and media reach was 531 million."		
	81:05 Did I read that correctly?		
	81:06 A. Yes, that's what it says.		
82:05 - 82:18	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:33	EJv4.31
 Clear	82:05 Do you know the demographics of		
	82:06 all the places that Katy Perry's image		
	82:07 appears?		
	82:08 A. No, I do not.		

EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	82:09 Q. Okay. And you have no idea		
	82:10 amongst the followers that she has on social		
	82:11 media whether or not -- how many of those are		
	82:12 under the age of 21, right?		
	82:13 A. I do not know that.		
	82:14 Q. So while you're increasing		
	82:15 awareness, you have no guarantees that it is		
	82:16 amongst adult smokers when you're doing that		
	82:17 increasing on social media, correct?		
	82:18 A. That's correct to say.		
111:03 - 111:08	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:17	EJv4.32
	111:03 tell me what		
	111:04 else is involved in the VIP service. We		
	111:05 talked about limited edition flavors, limited		
	111:06 edition designs. There were discounts.		
	111:07 What were the discounts that		
	111:08 were offered to the VIP program?		
111:09 - 111:11	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:10	EJv4.33
	111:09 A. I know that we discounted		
	111:10 product down to a dollar, plus tax, I		
	111:11 believe, and shipping.		
111:16 - 112:14	Edmondson taylor, Jessica 2021-03-11_WIT	00:00:55	EJv4.34
	111:16 Did they have a		
	111:17 special account where they were allowed to		
	111:18 get refills at discounted prices?		
	111:19 A. So I think you're asking me the		
	111:20 premise of the VIP portal and what that		
	111:21 entailed in terms of discounts; is that		
	111:22 correct?		
	111:23 Q. Yes.		
	111:24 A. Okay. So the VIP portal was		
	111:25 essentially a JUUL.com account that was		
	112:01 upgraded, upgraded in terms of a JUUL.com		
	112:02 account. Any customer can fill it out and		
	112:03 make it.		
	112:04 We simply upgraded it in the		
	112:05 back-end where discounts were automated as		
	112:06 part of our seamless white glove offering and		
	112:07 experience so they didn't have to plug in a		
	112:08 code.		

EJv4 - Edmondson, Jessica SFUSD FINAL_PLAYED 04-26-23

DESIGNATION	SOURCE	DURATION	ID
	112:09 Q. Okay. So they would		
	112:10 automatically get the discounts to a dollar,		
	112:11 true?		
	112:12 A. Yes. Once we flagged and		
	112:13 upgraded the accounts, they would receive		
	112:14 automatic discounts upon checking out.		
508:16 - 508:18	Edmondson taylor, Jessica 2021-03-12_WIT	00:00:04	EJv4.35
	508:16 MR. GOZA: Okay. I appreciate		
	508:17 that. Thank you. No more questions		
	508:18 for me.		

PLF AFFIRMATIVE	00:11:19
DEF COUNTER	00:00:24
PLF COUNTER-COUNTER	00:00:21
TOTAL RUN TIME	00:12:04



Documents linked to video:
TAYLOR1406

EXHIBIT 2

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

Case No. 19-md-02913-WHO

**JOINT STIPULATION IDENTIFYING
TRIAL EXHIBITS USED IN THE
VIDEOTAPED DEPOSITION OF JESSICA
EDMONDSON-TAYLOR PLAYED AT
TRIAL**

This Document Relates to:

***San Francisco Unified School District v.
Juul Labs, Inc. et al., Case No. 3:19-cv-
08177***

WHEREAS, Plaintiff called Jessica Edmondson-Taylor, whose videotaped deposition was played to the jury.

WHEREAS, the exhibit numbers in the videotaped deposition are different from the Trial Exhibit numbers.

WHEREAS, to most efficiently clarify the record, the parties, by and through their undersigned counsel, hereby stipulate and agree that the chart below accurately reflects the deposition exhibits introduced during the videotaped testimony of Jessica Edmondson-Taylor and the corresponding Trial Exhibit Numbers¹:

¹ The parties reserve all objections regarding these exhibits.

**JOINT STIPULATION IDENTIFYING TRIAL
EXHIBITS USED IN VIDEOTAPED DEPOSITION**

Respectfully submitted,

By: /s/ Beth A. Wilkinson

Beth A. Wilkinson (pro hac vice)
Brian L. Stekloff (pro hac vice)
James M. Rosenthal (pro hac vice)
Matthew R. Skanchy (pro hac vice)
Alysha Bohanon (pro hac vice)
WILKINSON STEKLOFF LLP
2001 M Street NW, 10th Floor
Washington, DC 20036
Telephone: (202) 847-4000
bwilkinson@wilkinsonstekloff.com
bstekloff@wilkinsonstekloff.com
jrosenthal@wilkinsonstekloff.com
mskanchy@wilkinsonstekloff.com
abohanon@wilkinsonstekloff.com

Moirira K. Penza (pro hac vice)
WILKINSON STEKLOFF LLP
130 West 42nd Street, 24th Floor
New York, NY 10036
Telephone: 212-294-8910
mpenza@wilkinsonstekloff.com

By: /s/ John C. Massaro

**ARNOLD & PORTER KAYE
SCHOLER LLP**

John C. Massaro (admitted pro hac vice)
David E. Kouba (admitted pro hac vice)
601 Massachusetts Ave., N.W.
Washington D.C. 20001
Telephone: (202) 942-5000
Facsimile: (202) 942-5999
john.massaro@arnoldporter.com
david.kouba@arnoldporter.com

*Attorneys for Defendants ALTRIA
GROUP, INC., PHILIP MORRIS USA
INC., ALTRIA CLIENT SERVICES LLC,
ALTRIA GROUP DISTRIBUTION
COMPANY, and ALTRIA
ENTERPRISES LLC*

By: /s/ Michael M. Weinkowitz

Michael M. Weinkowitz
LEVIN SEDRAN & BERMAN, LLP
510 Walnut Street
Suite 500
Philadelphia PA 19106
Telephone 215-592-1500
MWeinkowitz@lfsblaw.com
Plaintiff Steering Committee Member

Sarah R. London

Sarah R. London
LIEFF CABRASER HEIMANN & BERNSTEIN
275 Battery Street, Fl. 29
San Francisco, CA 94111
Telephone: (415) 956-1000
slondon@lchb.com

By: /s/ Dena C. Sharp

Dena C. Sharp
GIRARD SHARP LLP
601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
dsharp@girardsharp.com

By: /s/ Dean Kawamoto

Dean Kawamoto
KELLER ROHRBACK L.L.P.
1201 Third Ave., Ste. 3200
Seattle, WA 98101
Telephone: (206) 623-1900

By: /s/ Ellen Relkin

Ellen Relkin
WEITZ & LUXENBERG
700 Broadway
New York, NY 10003
Telephone: (212) 558-5500
Co-Lead Counsel for Plaintiff